

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**DEAN A. KOCH**

**: C.N. 3:18-cv-02287**

**Plaintiff,**

**v.**

**: JUDGE JEFFREY HELMICK**

**STATE OF OHIO**

**DEPARTMENT OF NATURAL RESOURCES**

**DIVISION OF WILDLIFE**

**:**

**Et al.,**

**:**

**Defendants.**

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**MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD  
TO COMPLAINT FOR DEFENDANTS DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF WILDLIFE, JAMES ZEHRINGER DIRECTOR, GINO BARNA, GARY  
MANLEY, BRIAN BURY, AND SCOTT ZODY, CHIEF, IN HIS OFFICIAL CAPACITY**

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Now comes counsel for Defendants State of Ohio Department of Natural Resources-  
Division of Wildlife, James Zehringer Director, Gino Barna, Gary Manley, Brian Bury, and Scott  
Zody, Chief of the Division of Wildlife, in his official capacity, and hereby move pursuant to  
Fed. R. Civ. P. 6(b)(1)(A) for an extension of time of twenty (20) days in which to answer or  
otherwise plead to Plaintiff's Complaint, for the reasons set forth in the accompanying  
memorandum.

Respectfully Submitted,  
MICHAEL DEWINE

/s/ Daniel J. Martin

Daniel J. Martin (0065249)  
W. Scott Myers (0040686)  
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**MEMORANDUM**

Counsel respectfully requests an extension of twenty (20) days to answer or otherwise plead to Plaintiff's Complaint. Based on the earliest service date of October 30<sup>th</sup>, ODNR Defendants request until on or before December 10<sup>th</sup>, 2018 to file an answer or other responsive pleading. Counsel needs additional time to review the complaint and respond on behalf of multiple Defendants. Counsel for Plaintiff has been advised of the request via telephone on November 16, 2018, and he does not object to the extension request. This is the first extension request and would not prejudice the parties.

Respectfully Submitted,  
MICHAEL DEWINE

/s/ Daniel J. Martin  
Daniel J. Martin (0065249)  
W. Scott Myers (0040686)  
Assistant Attorneys General  
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**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing Motion for Extension and Memorandum in Support was served this 19<sup>th</sup> day of November, 2018, upon counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system, and via regular U.S. Mail at the following addresses:

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/s/Daniel J. Martin